



The Chrysler Building
405 Lexington Avenue, NY, NY 10174-1299
Tel: 212.554.7800 Fax: 212.554.7700
www.mosessinger.com

Eliad S. Shapiro
Partner
Direct Dial: 212.554.7566
Fax: 212.377.6071
E-Mail: eshapiro@mosessinger.com

July 19, 2023

VIA ECF

Hon. Jennifer L. Rochon
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Case No. 23-cv-2381 — Kuriyan v. Schreiber et al.

Judge Rochon,

Our firm represents the Defendants in the above-referenced matter.

We write to request an adjournment of the Initial Pretrial Conference scheduled for July 27, 2023 to a date as soon thereafter that is convenient for the Court. The reason for the request is that I will be observing the Jewish fast day of *Tisha b'Av*. My custom prohibits work on that ritual day of mourning. Plaintiff consents to this request.

We also write with respect to the July 20, 2023 Case Management Plan deadline to request a stay of discovery pending adjudication of Defendants' anticipated motion to dismiss the Complaint. Defendants anticipate moving to dismiss on or before July 27, 2023, as directed by the Court. Plaintiff consents to this request. Given the anticipated dispositive motion, Plaintiff and Defendants are in agreement that setting a discovery schedule before the Court can decide whether this case should proceed would needlessly burden both the Court and the parties.

Respectfully submitted,

/s/ Eliad S. Shapiro

The parties' joint request to stay discovery during the pendency of Defendants' anticipated motion to dismiss is GRANTED. Accordingly, the Initial Pretrial Conference is adjourned without date. To the extent Defendants decide not to file a motion to dismiss, Defendants shall confer with Plaintiff and file a letter, no later than **July 31, 2023**, proposing dates for the Initial Pretrial Conference.

Dated: July 19, 2023
New York, New York

SO ORDERED

JENNIFER L. ROCHON
United States District Judge